

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

GREATER BOSTON LEGAL SERVICES, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND  
SECURITY, *et al.*,

Defendants.

Case No.: 1:21-cv-10083-DJC

**PLAINTIFFS' MOTION FOR LEAVE TO CONDUCT LIMITED DISCOVERY  
IN ORDER TO COMPLETE AND/OR SUPPLEMENT  
THE ADMINISTRATIVE RECORD**

Plaintiffs respectfully request this Court to grant their motion for leave to conduct limited discovery to determine the appropriate scope of the administrative record and to complete and/or supplement the administrative record previously submitted by Defendants.

This motion is based on the accompanying memorandum of law, the declaration of John T. Montgomery and exhibits thereto, as well as upon such further briefs, argument, or other information as may be submitted to the Court.

Dated: November 10, 2023

Respectfully submitted,

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**LOCAL RULE 7.1 CERTIFICATION**

I, John T. Montgomery, state that counsel for Plaintiffs conferred with counsel for Defendants in a good faith attempt to resolve or narrow the issues presented by this motion.

Dated: November 10, 2023

*/s/ John T. Montgomery*  
John T. Montgomery